

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

ATTACHMENT C-2:
DEFENDANTS' WITNESS LIST

Defendants identify herein the individual witnesses they will and/or may call for this lawsuit. Defendants reserve the right to modify or supplement this list of witnesses based on further discovery of information and the pretrial proceedings in this lawsuit. Defendants further reserve the right to supplement this list with reasonable notice to counsel.

Proposed Witness	Address	Anticipated Subjects of Testimony	Status
Dr. Ben Adida <i>A summary of Dr. Adida's opinions are found in his declarations and hearing testimony.</i>	Please contact through counsel.	Audits; rebuttal expert testimony	Will call
Michael Barnes	Please contact through counsel.	Georgia election system and security; implementation of updates to Dominion BMD system; the BMD voting experience	Will call
Dr. Juan Gilbert <i>A summary of Dr. Gilbert's opinions are found in his declarations, and deposition and hearing testimony.</i>	Please contact through counsel.	Election security; BMD voting systems; HMPBs; audits; rebuttal expert testimony	Will call
Gabriel Sterling	Please contact through counsel.	Allegations and relief sought in this action; audits; procurement and implementation of Dominion BMD system and updates to the Georgia voting system; physical; CISA; Ballot secrecy; recommended layout of voting machines; implementation of Plaintiffs' requested relief	Will call

Merritt Beaver	Please contact through counsel.	IT security; Fortalice assessments	May call
Chris Bellew	Please contact through counsel.	Georgia election system and security; implementation of updates to Dominion BMD system; the BMD voting experience	May call
Matthew D. Bernhard	2260 Hayward Street Ann Arbor, Michigan 48109	Enhanced Voting	May call
Nancy Boren	Attn: Elections & Registration Office P.O. Box 1340 Columbus, Georgia 31902	Balloting and voting process for in person and absentee voters; election preparations and physical security of election equipment; audits; implementation of the relief Plaintiffs seek	May call
Eric Chaney (or Coffee County Elections Board Representative)	Coffee County Elections & Registration Office 224 W Ashley Street, Douglas, Georgia 31533	Coffee County	May call
Coalition for Good Governance Corporate Representative	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Allegations, claims, and relief sought in this action	May call

Jack Cobb	Pro V&V 6705 Odyssey Drive, Suite C Huntsville, Alabama 35806	Voting system certification; review of voting equipment	May call
Benjamin Cotton	27427 Montana Highway 83, Bigfork, Montana 59911	Coffee County and work with VoterGA	May call
Alex Cruce	Attn: Courtney Kramer Binnall Law Group 717 King Street, Suite 200 Alexandria, Virginia 22314	Coffee County; ballot secrecy; efforts to investigate security and accuracy of Georgia election system; communications with Marilyn Marks	May call
Donna Curling	In care of Morrison & Foerster, LLP Attn: David Cross 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofo.com	Allegations, claims, and relief sought in this action	May call
Ricardo Davis	Ichter Davis LLC Attn: Cary Ichter 3340 Peachtree Road NE, Suite 1530 Atlanta, Georgia 30326	Allegations, claims, and relief sought in this action	May call
Laura Digges	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown	Allegations, claims, and relief sought in this action	May call

	1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700		
William Digges III	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Allegations, claims, and relief sought in this action	May call
Nick Ikonomakis - Dominion Corporate Representative	Attn: J. Matthew Maguire, Jr. 1355 Peachtree St NE #2000 Atlanta, Georgia 30309	Dominion BMD voting system security; Dominion Democracy Suite version 5.17	May call
James Elliott	577 Mulberry Street, Suite 1225 Macon, Georgia 31201	Municipal election administration in Georgia	May call
Joseph Blake Evans	Please contact through counsel.	Secretary of State election administration issues; recommended layout of voting machines; implementation of relief	May call
Ryan Germany	Gilbert, Harrell, Sumerford & Martin, PC 675 Ponce de Leon Ave NE Atlanta, Georgia 30308	Ballot secrecy; election administration issues	May call

Scott Hall	Attn: Lynsey Barron Barron Law 1800 Peachtree St. NE, Suite 300 Atlanta, Georgia 30309	Coffee County; efforts to investigate security and accuracy of Georgia election system; communications with Marilyn Marks	May call
Misty Hampton	830 Dennis Harper Road Ambrose, Georgia 31512	Coffee County	May call
Chris Harvey	Georgia Peace Officers Standards and Training Council 5000 Austell-Powder Springs Road, Suite 280 Austell, Georgia 30106	Ballot secrecy; recommended layout of voting machines; election administration	May call
Joseph Kirk	Bartow County Elections Office 1300 Joe Frank Harris Pkwy., Cartersville, Georgia 30120	Elections Administration; Balloting and voting process for in person and absentee voters; election preparations and physical security of election equipment; audits; implementation of the relief Plaintiffs seek	May call
Cathleen Latham	95 Banklodge Drive, Douglas, Georgia 31535	Coffee County	May call
Lynn Ledford	Gwinnett County Voter Registration and Elections	County elections administration; balloting and voting process for in person and absentee voters; election preparations	May call

	455 Grayson Highway, Suite 200 Lawrenceville, GA 30046 678.226.7210	and physical security of election equipment; implementation of the relief Plaintiffs seek	
Richard Lysinger	Please contact through counsel.	Secretary of State IT	May call
Marilyn Marks	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Allegations, claims, and relief sought in this action; Coffee County	May call
Matthew Mashburn	Please contact through counsel.	SEB regulations regarding election security and handling of equipment; SEB authority	May call
Megan Missett	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Allegations, claims, and relief sought in this action	May call
Theresa Payton	Attn: James E. Connelly 271 17 th Street, N.W. Atlanta, Georgia 30363	IT and cyber security	May call

James Persinger	Please contact through counsel.	IT and cyber security; Coffee County equipment	May call
Donna Price	In care of Morrison & Foerster, LLP Attn: David Cross 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofo.com	Allegations, claims, and relief sought in this action	May call
Secretary of State Brad Raffensperger	Please contact through counsel.	Allegations and relief sought in this action	May call
Jil Riddlehoover	50 Maplewood Road, Douglas, Georgia 31535	Coffee County	May call
Jeffrey Schoenberg	In care of Morrison & Foerster, LLP Attn: David Cross 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofo.com	Allegations, claims, and relief sought in this action	May call
Blake Voyles	309 North Gaskin Avenue, Douglas, Georgia 31533	Coffee County	May call
Nick Whitney	6303 Cowboys Way Frisco, Texas 75034	GARViS	May call

Any witness identified by any Plaintiff	N/A	N/A	May Call
--	-----	-----	----------